

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION

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IN RE: OPTIMA UNIVERSITY, LLC

CASE NO. 09-11212-GHB  
CHAPTER 11

Debtor(s)

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EXPEDITED HEARING REQUESTED  
MOTION TO LIFT STAY FILED BY BANK OF GLEASON

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COMES NOW, Bank of Gleason, and in support of its Motion to Lift Stay would state:

1. The debtor filed for relief under Chapter 11 of the Bankruptcy Code, bearing Case No. 09-11212-GHB, on or about March 23, 2009.
2. Bank of Gleason is secured by virtue of it holding a lien on a 2005 Toyota Tacoma 4 x4 pickup VIN 5TBDT44155S80441.
3. Bank of Gleason avers that the debtor executed the underlying Promissory Note on March 17, 2009, five days before filing bankruptcy.
4. The debtor made the contractual payment due for May, 2009, made a partial payment in June, 2009 (short \$4.44) and has not made a payment since.
4. Bank of Gleason avers that the debtor has no equity in the collateral on which it holds a lien and that same is not necessary for an effective reorganization of the debtor.
5. Bank of Gleason avers that the debtor is unable to provide adequate protection to your creditor as evidenced by its inability to make regular and timely payments.
6. Bank of Gleason avers that the debtor is unable to provide adequate protection in the form of insurance coverage for the said vehicle.
7. Cause exist to lift the stay.

Wherefore Premises Considered:

Bank of Gleason moves this Honorable Court to require the debtors to voluntarily surrender the vehicle to Bank of Gleason and for an Order Lifting the §362 Automatic Stay to allow it to repossess its collateral and dispose of same in accordance with the laws of the State of Tennessee and for such other, further, and general relief to which it may be entitled.

This 21<sup>st</sup> day of August, 2009.

Respectfully submitted,

By: /s/Stephen L. Hughes

\*Prepared By:

Stephen L. Hughes #013836

Attorney for Bank of Gleason

P.O. Box 320

Milan, Tennessee 38358 (731) 686-1198

CERTIFICATE OF SERVICE

We, Kizer, Bonds, Hughes & Bowen, PLLC, Attorneys at Law, hereby certify that we have served a true copy of the foregoing instrument electronically or by depositing a copy of same in the U.S. mail postage paid, to the following parties on August 21, 2009

By: /s/Stephen L. Hughes

Stephen L. Hughes

Postage Pre-Paid

Debtor(s)

Creditor: Bank of Gleason, P.O. Box 697, McKenzie, TN 38201

Electronically

U.S. Trustee

Debtor(s) Attorney slefkovitz@lefkovitz.com